

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

JAIME MARTINEZ ROMERO,

C O M P L A I N T
(T. 8, U.S.C.,
§ 1324(a)(1)(A)(i);
T. 18, U.S.C., § 2)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID REWKOWSKI, being duly sworn, deposes and states that he is a Special Agent with United States Homeland Security Investigations duly appointed according to law and acting as such.

Upon information and belief, in or about and between November 2010 and January 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JAIME MARTINEZ ROMERO, together with others, knowing that a person is an alien, did knowingly and intentionally bring to the United States such person at a place other than a designated port of entry.

(Title 8, United States Code, Section 1324(a)(1)(A)(i);
Title 18, United States Code, Section 2)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest,

INTRODUCTION

1. Since July 2011, I have been a Special Agent of United States Homeland Security Investigations ("HSI"). In my capacity as an HSI Special Agent, I am involved in the investigation of immigration violations and human trafficking. I am familiar with the facts and circumstances set forth below from conversations with other HSI agents and my review of the investigative file. Prior to joining HSI, I was an Inspector with the Federal Protective Service for approximately three years.

PROBABLE CAUSE

2. On or about January 5, 2012, HSI agents and New York City Police Department ("NYPD") detectives went to a house located at 82-11 32nd Avenue (the "32nd Avenue House") in Queens, New York.

3. The HSI and NYPD investigators knocked on the door to the 32nd Avenue House and were allowed in by one of the occupants. Once inside that location, the investigators found the defendant JAIME MARTINEZ ROMERO, as well as one other male and two females. HSI Agents questioned the occupants about their immigration status, and determined that they were all citizens of

Mexico residing in the United States illegally. All four occupants were taken into custody by HSI agents for processing.

A. Statements of Jane Doe

4. After the arrests, one of the two females ("Jane Doe") agreed to speak to the HSI agents and provided the following information, in part and substance:

a. Jane Doe stated that she has been involved in a romantic relationship with the defendant, JAIME MARTINEZ ROMERO, whom she referred to as her husband, for the past two years.

b. In or about November 2010, the defendant arranged for smugglers to take him and Jane Doe into the United States from Mexico. Although the defendant and Jane Doe traveled together to the U.S.-Mexico border, they deliberately took separate routes to cross the border. Jane Doe crossed the border on foot and not at an official entry point.

c. The defendant and Jane Doe reunited after they both crossed into the United States, and traveled to Queens, New York together.

d. Since arriving in the United States, Jane Doe has worked in prostitution. The defendant was aware that Jane Doe was engaged in this activity.

B. Defendant's Statements

5. After his arrest, the defendant waived his Miranda rights, orally and in writing, and provided the following information, in part and substance, to HSI agents:

a. He was involved in a romantic relationship with Jane Doe, whom he referred to as his wife.

b. In or about November 2010, he arranged and paid for smugglers to take him and Jane Doe to the United States from Mexico. The total cost was \$7,000 (U.S.).

WHEREFORE, your deponent respectfully requests that the defendant JAIME MARTINEZ ROMERO be dealt with according to law.

David Reworkski
Special Agent
Homeland Security Investigations

Sworn to before me this
20th day of January, 2012

THE HON. JAMES ORENSTEIN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK